

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 21-11337</b>
<b>Vanessa R. Putman FKA Vanessa R Scott</b>	:	<b>Chapter 13</b>
	:	<b>Judge Eric L. Frank</b>
	:	<b>*****</b>

**Debtor(s).**

<b>Vanessa R. Putman FKA Vanessa R Scott, Ronald Putman, Kenneth E. West</b>	:	
<b>Movant</b>	:	<b>Related to Document No. 53</b>
<b>v.</b>	:	

<b>Deutsche Bank National Trust Company, as Trustee on behalf of HSI Asset Securitization Corporation Trust 2006-HE1</b>	:	
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**Respondent**

**RESPONSE TO MOTION TO VACATE ORDER GRANTING RELIEF (DOCKET # 53)**

Now comes Deutsche Bank National Trust Company, as Trustee on behalf of HSI Asset Securitization Corporation Trust 2006-HE1 ("Creditor"), by and through its mortgage servicing agent Nationstar Mortgage LLC d/b/a Mr. Cooper, by and through its attorneys, Manley Deas Kochalski LLC, and responds to the Motion to Vacate Order Granting Relief filed by Vanessa R. Putman FKA Vanessa R Scott ("Debtor") on April 11, 2022 at Docket # 53. Creditor avers as follows:

1. Admitted.
2. The averments contained in the corresponding paragraph refer to a document in writing, to which no responsive pleading is required.
3. The averments contained in the corresponding paragraph refer to a document in writing, to which no responsive pleading is required.

4. The averments contained in the corresponding paragraph refer to a document in writing, to which no responsive pleading is required. To the extent any response is needed, at the time the Certificate of Default was filed, Debtor was due for the January 2022 through March 2022 payments.
5. The averments contained in the corresponding paragraph refer to a document in writing, to which no responsive pleading is required. To the extent any response is needed, at the time the Relief Order was entered, Debtor remained delinquent.
6. Denied. Respondent lacks sufficient knowledge or information to form a belief as to the truth of averments contained in the corresponding paragraph.
7. Admitted. Creditor applied payments on March 24, 2022, April 13, 2022, April 19, 2022, and on April 21, 2022, bringing the loan post-petition due for May 1, 2022. However, Creditor has incurred costs of \$100.00 in filing the Certificate of Default and \$500.00 in responding to the instant Motion.
8. Admitted. Creditor believes the matter maybe resolved by a stipulation vacating the stay but providing for payment of costs.

WHEREFORE, Creditor requests Debtor's Motion be denied.

Respectfully submitted,

/s/ Alyk L. Oflazian

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Attorneys for Creditor

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